

Hales, Dana

From: Hales, Dana
Sent: Tuesday, January 19, 2021 5:25 PM
To: Price-Fay, Michelle
Cc: Martinsen, Jessica
Subject: PERMIT - PA0244449 Marcus Hook Generating Station

Importance: High

Categories: EZ Record - Shared

Michelle,

Here are my comments on the Marcus Hook draft permit. Michelle, these comments are due tomorrow. I've been working with the permit writer since last week on questions, but she was only available to talk today. Apologies for the delay in sending to you. I'll be emailing you and Jess separately about the PCB issues for these types of facilities vs. PCB TMDL requirements.

Comments due: January 20, 2021

Comments go to: saabraham@pa.gov

cc: to sefurjanic@pa.gov, prpatel@pa.gov, Jessica, Dana, Natalie, Ryan, Joe and Andre.

Sara,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Marcus Hook Generating Station

NPDES Number: PA0244449

EPA Received: December 21, 2020

30-day response due date: January 20, 2021

This is a major permit that discharges to the Delaware River. EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Delaware River PCB TMDL, WET, Steam Electric Power Generating ELG (40 CFR Part 423), and 316(b) requirements. EPA has completed its review and offers the following comment(s):

1. As discussed with Dana Hales on 1/19/21, the following changes to the draft permit and/or fact sheet will be addressed:
 - a. The permit applies 40 CFR 423.12 BPT requirements, but does not apply the applicable BAT requirements at 423.13:
 - i. (a) – related to no discharges of PCBs (this is also a requirement of 423.12(b)(2)),
 - ii. (b)(1) and (b)(2) – related to TRC in discharges of once through cooling water (while we discussed this section, please clarify whether this part of the ELG addressing once through cooling water actually applies to this facility),
 - iii. (d)(1),(2) and (3) – related to level of pollutants discharged in cooling tower blowdown.
 - b. Clarification is going to be provided on the WET data summarized in the fact sheet regarding the dilution series used by the facility and how PADEP evaluated WET toxicity.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Dana Hales on my staff via telephone at 215-814-2928 or via electronic mail at hailes.dana@epa.gov.

Thank you,

Dana Hales
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Clean Water Branch
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